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ARIZONA CORPORATION COMMISSION
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Attorneys for The Links at Coyote Wash Utilities, LLC

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF THE
APPLICATION OF THE LINKS AT
COYOTE WASH UTILITIES, LLC, FOR
APPROVAL OF A PERMANENT RATE
INCREASE.

DOCKET NO. SW-04210A-10-0392

NOTICE OF COMPLIANCE

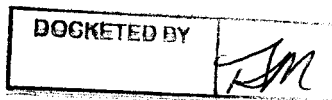
Pursuant to Decision No. 72491 (July 25, 2011) ("Order"), The Links at Coyote Wash Utilities, LLC (the "Company") hereby submits this Notice of Compliance in the above-captioned matter. The Order requires the Company to submit a biannual report detailing all odor complaints from its customers, along with a description of the actions that the Company has taken or intends to take to remedy the problem. See **Exhibit A** attached hereto.

DATED this 20th day of July, 2012.

FENNEMORE CRAIG, P.C.

Arizona Corporation Commission
DOCKETED

JUL 20 2012



By

Patrick J. Black
3003 North Central Avenue
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1 ORIGINAL and 13 copies filed this
2 20th day of July, 2012, with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 COPY hand-delivered this 20th day of July, 2012:

8 Ayesha Vohra, Esq.
9 Legal Division
10 Arizona Corporation Commission
11 1200 West Washington Street
12 Phoenix, Arizona 85007

13 Carmel Hood, Compliance
14 Utilities Division
15 Arizona Corporation Commission
16 1200 West Washington Street
17 Phoenix, Arizona 85007

18 By: *Maria San Jose*
19 7146878.1/016307.0002

EXHIBIT

A

July 19, 2012

Arizona Corporation Commission
Docket Control
1200 W. Washington St.
Phoenix, AZ 85007

Subject: Links at Coyote Wash Utilities, LLC – Decision 72491
Compliance Item – Bi-annual Update on Odor Complaints & Actions taken

During the first half of 2012, the operators & management of Links at Coyote Wash Utilities, LLC (LACW) received four odor complaints. The last complaint received was on April 24, 2012. In late March, a community group also met with our operator, Rick Miller at Sunstate Environmental, at the WWTP site for a tour of the facility. At this time, odor issues were discussed as well.

LACW has responded to the odor complaints in a number of ways:

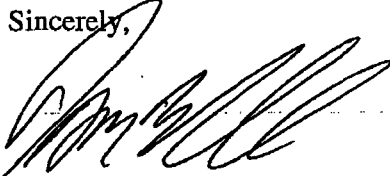
- We have developed an odor complaint reporting procedure, which we have provided to the community group, our operator, and to any customers who have an odor complaint. We feel that the customer's use of these procedures will help LACW respond in a more effective way. A copy of this document is attached hereto.
- We responded to complaints initially by trying to identify the source of the odor, which has not been clear. Many of the complaints have been due to odors emanating from the golf course ponds, and the golf course's irrigation system that utilizes these ponds as their source. It was discovered that some of the aeration systems in these ponds were not operating properly. It is likely that these odors have nothing to do with the WWTP operations. It is our understanding that these pond aeration systems have subsequently been improved, and we have worked with customers to provide a line of communication directly with the owner and manager of the golf course for future concerns.
- We have inspected sewer mains following one complaint that odors were coming into a customer's house via the sewer system. We did not discover any blockages or backups in the sewer mains near the property, however, LACW has scheduled a maintenance cleaning of the sewer lines in the subdivision for the fall of 2012 as a preventative measure.
- LACW has analyzed potential areas where low flows in the sewer mains (because of very few houses on long stretches of sewer lines) may be causing raw sewage to become septic, which can cause objectionable odors when the material reaches the WWTP. We have negotiated with the developer to have a water truck introduce fresh water to some of these prone areas on a regular basis to help minimize the potential for raw sewage to become septic due to low flows.

- We have reviewed our onsite odor control measures, including carbon filtration units which are installed on the treatment plant vessels. We have ensured that the operators are changing out the activated carbon within these units on a regular basis, as well as making sure that the units are sealed properly.

In general, as manager of LACW, I have made it clear to the operator, and facility owner, that the best policy to handling odor complaints is responsiveness. Even in the cases when it was not the responsibility of LACW (because the odors were coming from the golf course ponds), our ability to facilitate a response and eventually a resolution to the odor issues will aid LACW in their dealings with customers in the future. I personally have made my contact information available to customers as questions arise (both with respect to odors and otherwise as it relates to the sewer system), and I plan to continue to keep these channels open.

If you have any questions, please contact me.

Sincerely,



Jason Williamson
Manager, Links at Coyote Wash Utilities, LLC
7581 E Academy Blvd. Suite 229
Denver, CO 80230
(720) 949-1384

September 16, 2011

Links at Coyote Wash Utilities Customers:

In accordance with the recent Rate Case Decision (No. 72491) of the Arizona Corporation Commission, we are required to update our customers on the status of our investigation of odor issues related to the wastewater treatment plant serving you.

In the last year, we have replaced some of the aeration piping and diffuser equipment in the treatment plant, which has improved the oxygen transfer rates and mixing in the process. We have also replaced carbon kits which are designed to remove noxious odors which may escape parts of the treatment process. In the last six months (after some of these repairs were completed), the company has not received any odor complaints.

For purposes of providing our customers with more responsive service, we would like to outline the process for making an odor complaint:

1. If you smell an objectionable odor, and believe it may be coming from the treatment plant or sewer collection system, please write down the following information:
 - a. Date, Time & Duration, and weather conditions (cloudy, sunny, wind direction, precipitation?)
 - b. Your location (address and proximity – i.e. “standing on sidewalk in front of my house at”).
 - c. The direction the odor seems to be coming from (if identifiable).
2. If possible, walk in a couple directions from initial odor to determine if it is particular to your property/area, or more regional. Please note any findings.
3. Describe the strength and to the extent possible, the type of odor (i.e. smells like a feed lot, smells like sulfur, smell is very musty).
4. Contact our contract operator, Sunstate Environmental at (928)920-9056. If you do not get an answer immediately, leave a message with the pertinent information from above and include your contact information. OR Email the information requested to: rick@sunstatees.com OR general@pivotalcompanies.com.
5. Someone from Sunstate Environmental or Pivotal Utility Management will get back with you within 24 hours. If you do not receive a return contact within 24 hours, contact Pivotal Utility Management toll free (866)681-0148 (offices open Monday-Friday 9A – 5P Mountain Time).

We very much appreciate your assistance with this program, and expect that with your help and information, we will be better able to react to and mitigate any Wastewater Treatment Plant odor issues going forward.

Sincerely,

Jason Williamson
Manager, Links at Coyote Wash Utilities